

In re Terrorist Attacks on Sept. 11, 2001

Dallah Avco Renewed Dispositive Motions



Overview

Dallah Avco's Obligations under the ANSS Contract

Al Bayoumi's Educational Studies

Al Salmi's Payments to Al Bayoumi



Dallah Avco's Obligations under the ANSS Contract

Ex 10 (KSA0000002070)

Recruiting



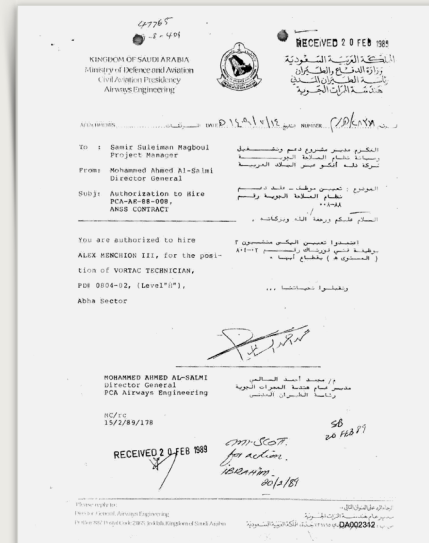
																		MED		TABLE 2-6
PSN NO.	ORGANIZATIONAL ELEMENT	CFC	PSB	LOG	PRD	SED	TPD	MPD	DES	MOB	ABH	DIA	JED	MAO	BIX	TAB	TIF	TOTAL		
0400	LEVEL '0'																			
0401	CONTRACTS SPECIALIST		1															1		
0402	SUPERVISOR, WAREHOUSE OPERATIONS			1														1		
0403	TECHNICAL RESEARCH ENGINEER				1													1		
0404	SNR. CERT/OUT SPECIALIST							2										2		
0405	SNR. TECHNICAL INSTRUCTOR							1										1		
0406	DATA PROCESSING SUPERVISOR								1									1		
0407	ELEC/MECH MAINTENANCE ENGINEER									3								3		
0408	COMMUNICATIONS SUPERVISOR											1	1			1		3		
0409	NAVAIDS SUPERVISOR											1	1			1		3		
0410	RADAR SUPERVISOR											1	1			1		3		
0411	ANALYST/PROGRAMMER NAT II LIS						1											1		
0412	AUTOMATION ENGINEER		2															2		
0413	DSS/PROGRAMMER (KAIA SYS)						1											1		
0414	DSS/PROGRAMMER (KFA SYS)							2										2		
0415	DSS/PROGRAMMER CORAL/AMSS						1											1		
0416	DSS/PROG VAX/RTL/PHILIPS (KAIA SYS)							1										1		
0417	QUALITY CONTROL SPEC (NEW EQUIP)		1															1		
0418	POWER DISTRIBUTION ENGINEER						1											1		

Ex 10 (KSA0000002316)

Recruiting



دالافكو *dallah AVCO*
TRANS ARABIA **مستشارات النقل العربية**
LIMITED LIABILITY COMPANY **شركة ذات مسؤولية محدودة**



6

Recruiting: Direct Hires

SECTION 4 SCOPE OF SERVICES		
TABLE OF CONTENTS		
ARTICLE	T I T L E	PAGE NO.
4-1	INTRODUCTION	4-1
4-2	MANMONTH PERSONNEL	4-1
4-2-1	RECRUITMENT	4-1
4-2-2	CONTRACTOR M	4-1
4-2-3	EMPLOYEE PERF	4-1
4-2-4	PROFICIENCY IN	4-1
4-2-5	REPLACEMENT C	4-1
4-2-6	UNSATISFACTORY	4-1
4-2-7	TERMINATION OF	4-1
4-2-8	TERMINATION OF	4-1
4-2-9	PERSONNEL UNA	4-1
4-2-10	REVIEW OF MAN	4-1
4-2-11	INCREASES IN M	4-1
4-2-12	REDUCTIONS IN	4-1
4-2-13	NOT APPLICABLE	4-1
4-2-14	NOT APPLICABLE	4-1
4-2-15	OPERATIONAL W	4-1
4-2-16	PERMANENT ASS	4-1
4-2-17	HOUSING AND A	4-1
4-2-18	TRANSPORTATI	4-1
4-2-19	HOLIDAYS	4-1

4-2-1-2

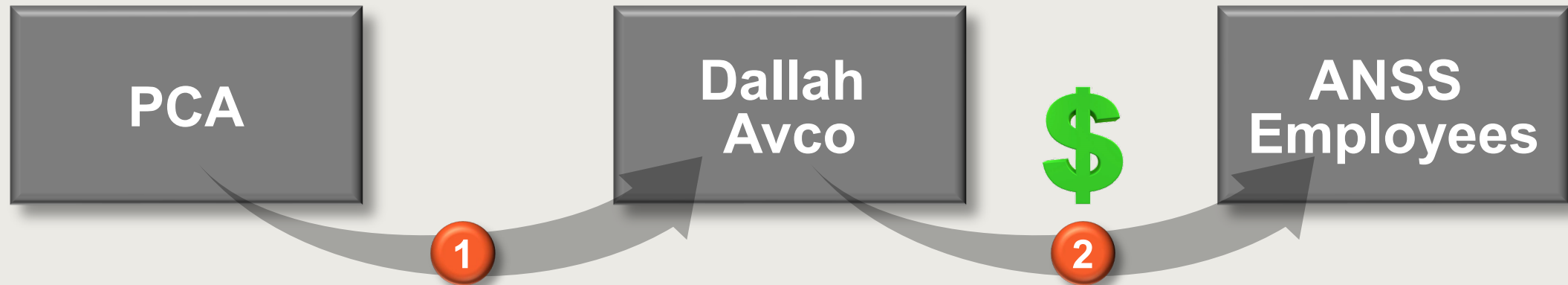
Recruitment-Responsibilities and Approval: The Contractor shall be entirely responsible for all aspects of the recruitment process, subject only to prior Government approval of Contractor-selected candidates, **except that the Government may, at its discretion, at any time, direct the Contractor to hire any individual or individuals whom the Government deems suitable for employment under the Contract.** The Contractor shall obtain Government

Ex 10 (KSA0000002189)
(Article 4-2-1-2)

xiii

KSA0000002186

Salary Processing



Authorization to Hire

07765
4-496

RECEIVED 20 FEB 1988

KINGDOM OF SAUDI ARABIA
Ministry of Defense and Aviation
Civil Aviation Authority
Airways Engineering

TO : Samir Suleiman Magh
Project Manager

FROM : Mohamed Ahmed Al-S
Director General

SUBJ: Authorization to hire
PCA-AM-88-008,
ANSS CONTRACT

You are authorized to hire
ALEX MENTION III, for the posi-
tion of VORTAC TECHNICIAN,
PD# 0804-02, (Level "II"),
Abha Sector

MOHAMED AHMED AL-S
Director General
PCA Airways Engineering

RC/L
15/2/88/176

RECEIVED 20 FEB 1988

DA002342

Salary Processing



Reimbursement Request

SECTION 3
FINANCIAL CONDITIONS
ATTACHMENT D

3-7 SCHEDULE OF PRICES AND QUANTITIES

3-7-1 *Manmonth Prices*

MAN-MONTH	1ST YEAR RATE	2ND YEAR RATE	3RD YEAR RATE
LEVEL_A			
MM/YR REQUIRED	216	204	192
RATE IN SR	22,229	22,798	23,579
TOTAL COST/YR SR	4,801,464	4,650,792	4,527,168
LEVEL_B			
MM/YR REQUIRED	300	264	252
RATE IN SR	19,214	19,694	20,349
TOTAL COST/YR SR	5,764,200	5,199,216	5,127,948
LEVEL_C			
MM/YR REQUIRED	480	456	444
RATE IN SR	18,635	19,093	19,722
TOTAL COST/YR SR	8,944,800	8,706,408	8,756,568

Page - 3D - 1

KSA0000002169

Ex 10 (KSA0000002169)

Salary Processing

Pay Advice Report(Run : 05-NOV-1999)

Personal Monthly Salary 7740 Number 050040		Job Title 0070301 Name AL BAYOUMI, Mr. OMER AHMED	
---	--	--	--

Payments		Deductions	
Basic Salary	7740.00		
Housing Allow	1290.00		
Other Allowance	1742.00		
Tranporrtation	774.00		
Total	11546.00	Total	

Tax Tax Period 7 Tax Ref. No. DALLAH Tax Tel. No. Tax Code Tax Basis Non Cumul. N.I. Number N.I. Category Pay Date 05-NOV-1999	
---	--

Amount Paid Amount 11546.00	
--	--

Payment Methods			
Method	Bank	Account No.	Amount

Balances	
Gross YTD	11546.00
Gross PTD	11546.00
Taxable YTD	11546.00
Taxable PTD	11546.00
PAYE YTD	0.00
Nliable YTD	0.00

Messages	
Message	

Logistics

Purchase Request

PCA

Dallah Avco

KINGDOM OF SAUDI ARABIA
Ministry of Defense and Aviation
Civil Aviation Presidency
Airways Engineering

ATTACHMENT: PR's
Date: 23 Oct 1995
Subject: U.S. Transmittal #0164 (ANSS 111)

ERCAN INCORPORATED
567 San Nicolas Drive, Suite 306
Newport Beach, CA 92660
United States of America

Attention: Magdi A. Hanna, Director

Enclosed, please find the following Purchase Requests for procurement action against the indicated document numbers.

PR Number	Priority	Item Number(s)
1. 76115	02	01 only
2. 76121	02	01 only
3. 76126	02	01 thru 05
4. 76128	02	01 & 02 only
5. 76130	02	01 thru 05
6. 76133	02	01 & 02 only
7. 76136	02	01 thru 05
8. 76139	02	01 only
9. 76140	02	01 thru 05
10. 76227	02	01 thru 05

Magdi A. Hanna
Director General
Airways Eng'g PCA

Acknowledgment

CC: Senior Regional
Commander

DA010695

Ex 57 (DA010695)

Ercan

ERCAN INC.

567 San Nicolas Drive, Suite 306
Newport Beach, CA 92660
United States of America

PCA REURSEABLE
DATA-ANSS IF

ORIGINAL INVOICE

ITEM	QTY	UNIT	PRICE	TOTAL	DATE	REMARKS
1	1	EA	100.00	100.00	10/1/95	
2	1	EA	100.00	100.00	10/1/95	
3	1	EA	100.00	100.00	10/1/95	
4	1	EA	100.00	100.00	10/1/95	
5	1	EA	100.00	100.00	10/1/95	
6	1	EA	100.00	100.00	10/1/95	
7	1	EA	100.00	100.00	10/1/95	
8	1	EA	100.00	100.00	10/1/95	
9	1	EA	100.00	100.00	10/1/95	
10	1	EA	100.00	100.00	10/1/95	

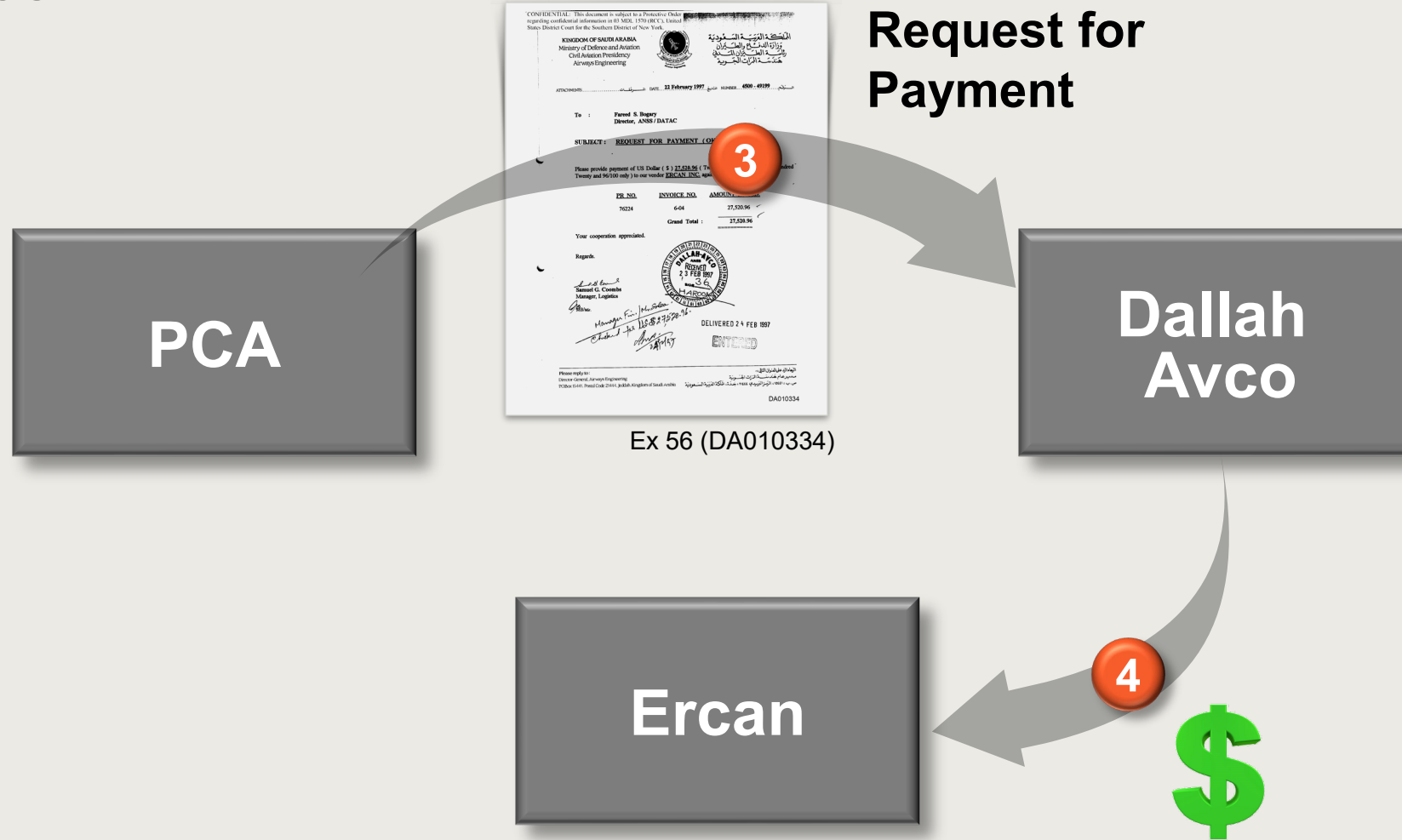
APPROVED FOR PURCHASE
PR No. 76224
PR No. 76224
BY: [Signature]

DA010335

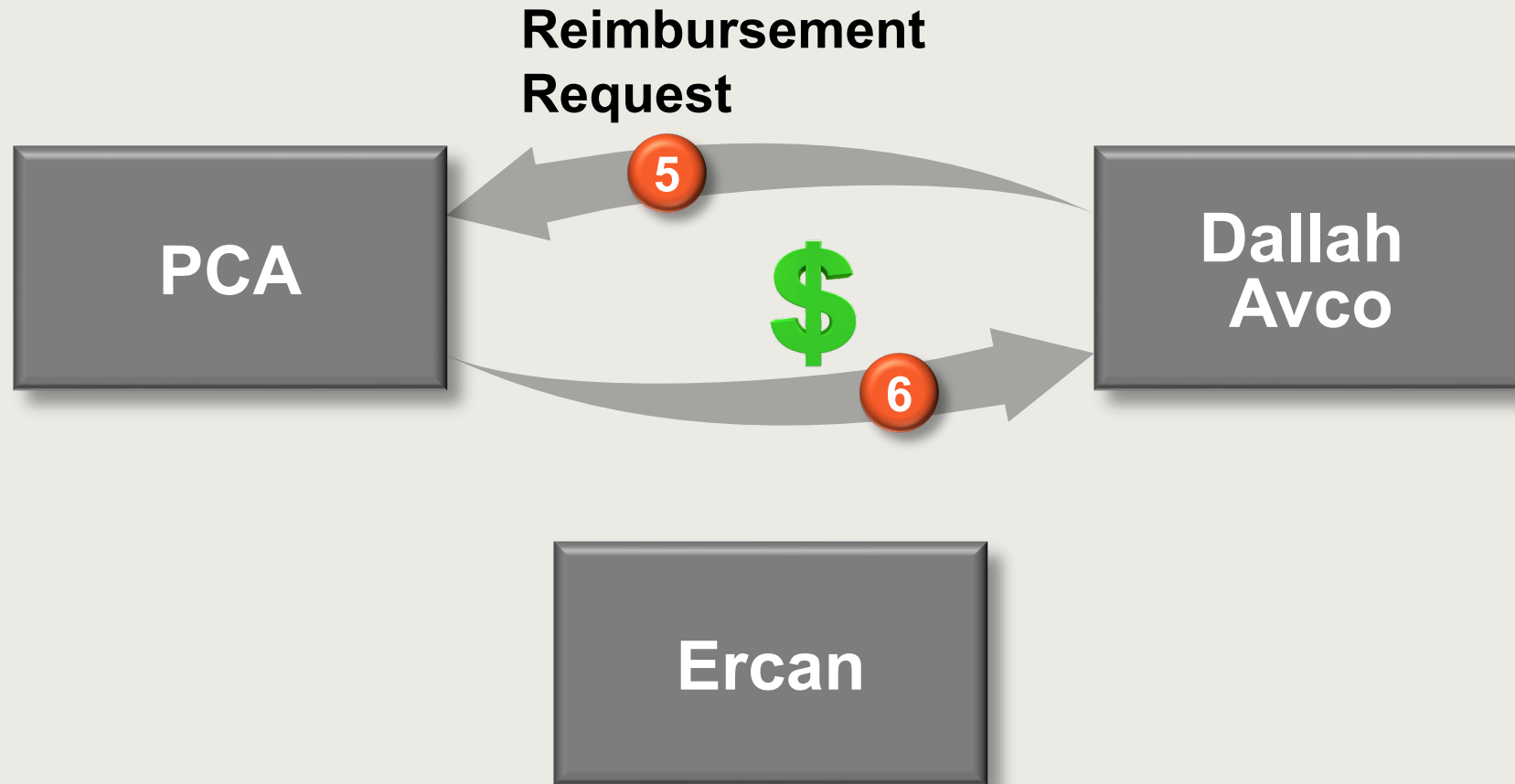
Ex 56 (DA010335)

Invoice /
Goods and
Services

Logistics



Logistics





Omar Al Bayoumi

Al Bayoumi's Educational Studies

Documents Revealed in Discovery



SAN DIEGO STATE
UNIVERSITY

Aug 1994 – Feb 1995

SDSU

Ex. 86 (PEC-KSA1-000075)

Transcript

1994

1995

1996

1997

1998

1999

2000

2001

2002

Documents Known to Dallah Avco

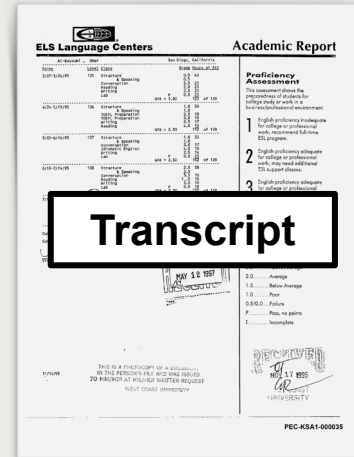
Tuition
Payment

Lawton
Letter

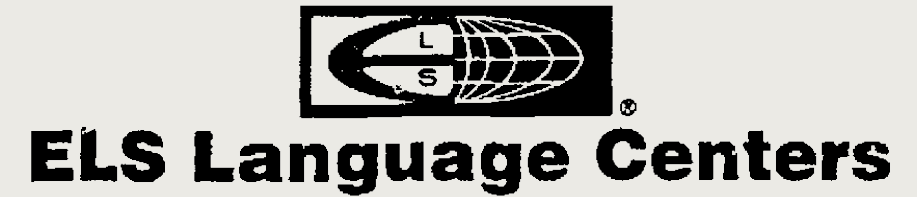
Ex. 49 (DA002262)

Ex. 33 (DA001105)

Documents Revealed in Discovery



Ex. 82 (PEC-KSA1-000035)



Feb 1995 – Aug 1995

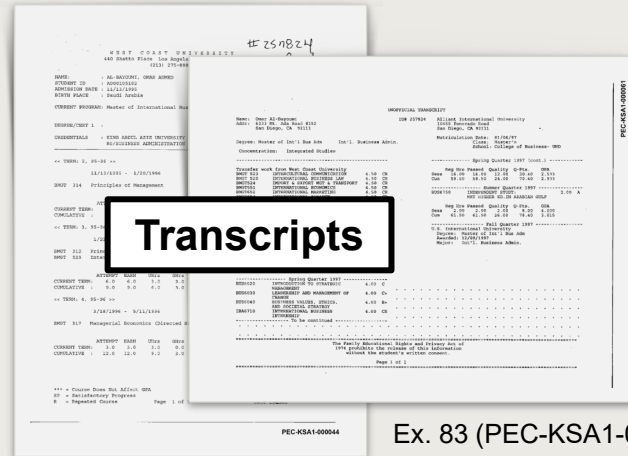
SDSU ELS



Documents Known to Dallah Avco

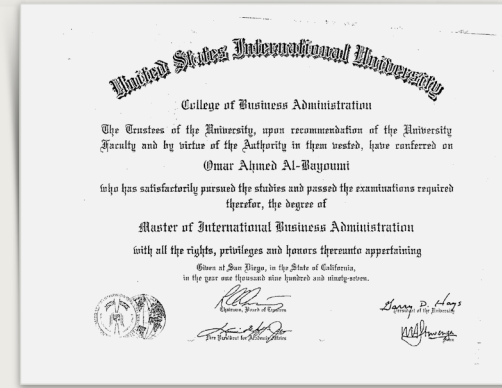
NO DOCUMENTS

Documents Revealed in Discovery



Ex. 83 (PEC-KSA1-000044)

Ex. 84 (PEC-KSA1-000061)



Ex. 63 (KSA0000000725)



Nov 1995 – Dec 1997

SDSU ELS

WCU

USIU

1994

1995

1996

1997

1998

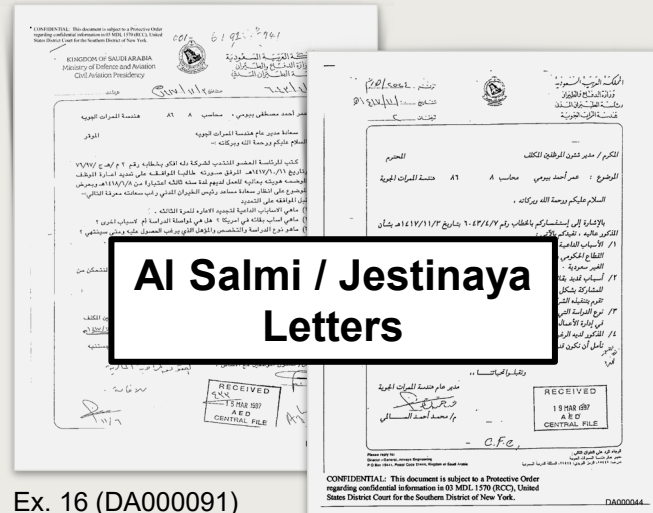
1999

2000

2001

2002

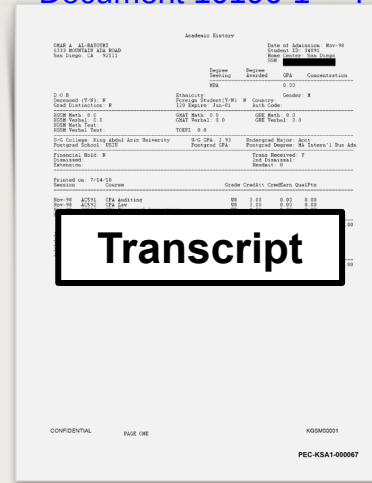
Documents Known to Dallah Avco



Ex. 16 (DA000091)

Ex. 13 (DA000044)

Documents Revealed in Discovery

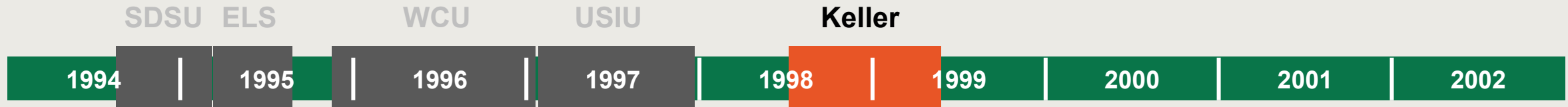


Ex. 85 (PEC-KSA1-000067)



DeVry University
Keller Graduate School
of Management

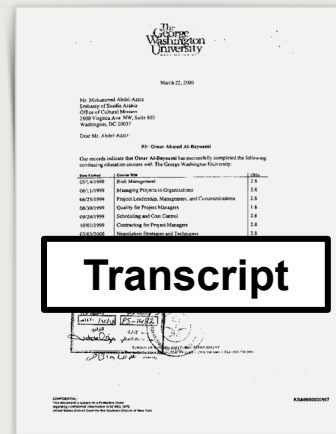
1998 – 1999



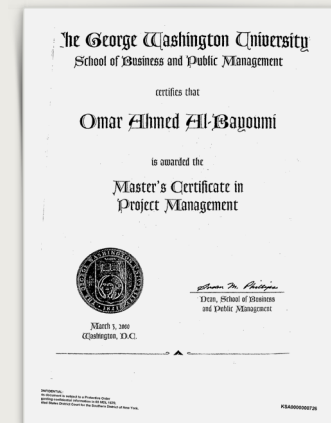
Documents Known to Dallah Avco

NO DOCUMENTS

Documents Revealed in Discovery



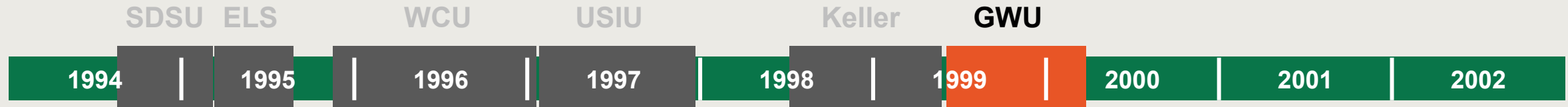
Ex. 70 (KSA0000000907)



Ex. 64 (KSA0000000726)



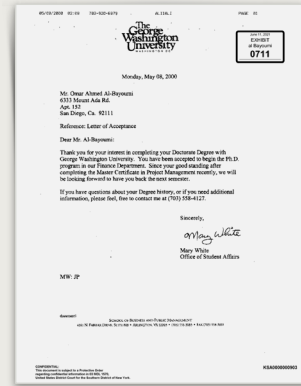
May 1999 – Mar 2000



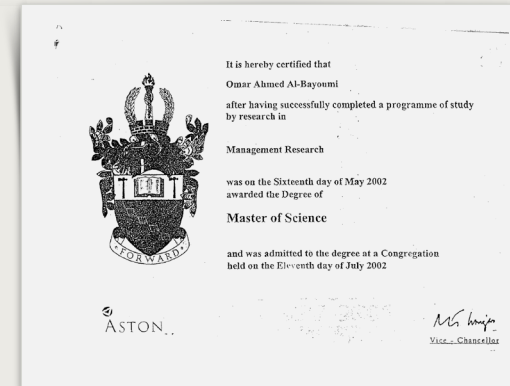
Documents Known to Dallah Avco

NO DOCUMENTS

Documents Revealed in Discovery



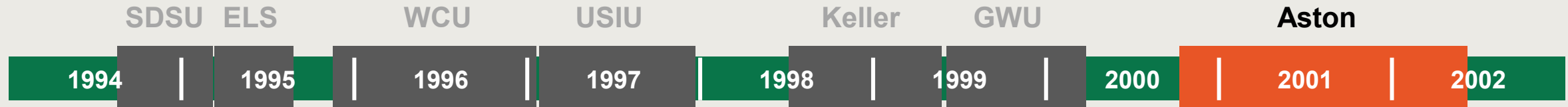
PECs Ex. 229 (KSA0000000903)



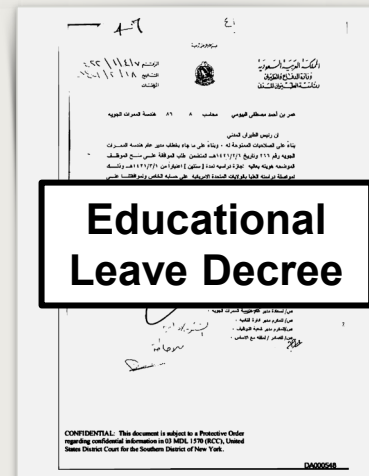
Ex. 62 (KSA0000000724)



October 2000 – June 2002



Documents Known to Dallah Avco



Ex. 21 (DA000548)



Al Salmi's Payments to Al Bayoumi

Saudi Civil Service Regulations

Anqari Exhibit

396

دليل الاجازات

مادة رقم (28)

وط الاجازات وفترات الغياب التي يستحقها الموظف او يؤذن له فيها.

نظام الخدمة المدنية الصادر بالمرسوم الملكي رقم 49 م في 7 / 10
لها الواردة في اللائحة التنفيذية لنظام الخدمة المدنية الصادرة بقرار
في 1397 / 7 / 27 هـ هي المستندات النظامية في منح الاجازات التالية
1

(الاجازة العادية).

(2) اجازة العيدين.

(3) اجازة الامتحان الدراسي.

(4) الاجازة الاضطرارية.

(5) الاجازة المرضية.

(6) اجازة المرافقة.

(7) الاجازة الدراسية.

(8) الاجازة الاستثنائية.

(9) اجازة الوضع و عدة الوفاة للموظفات.

ة التنفيذية لنظام الخدمة المدنية وانما ورد النص عليها في قرار مجلس
(في 1391 / 9 / 7 هـ وهي الاجازة الخاصة بالرياضيين.

ثانياً : الاجازة العادية

1) 28 / 1

تدرا ثلاثون يوماً عن كل سنة من سنوات الخدمة براتب كامل يصرف
مقدماً حسب اخر راتب تقاضاه الموظف.

ثامناً : الاجازة الدراسية

28 / 19

يجوز ان يمنح الموظف اجازة دراسية بدون راتب اذا كان يحمل شهادة الدراسة الثانوية او ما يعادلها
بشرط:

1- ان يكون قد امضى في الخدمة ثلاث سنوات بتقدير جيد على الاقل.

2- ان يكون لموضوع دراسته علاقة بالعمل في الجهة التي يعمل بها.

Eighth: Educational Leave

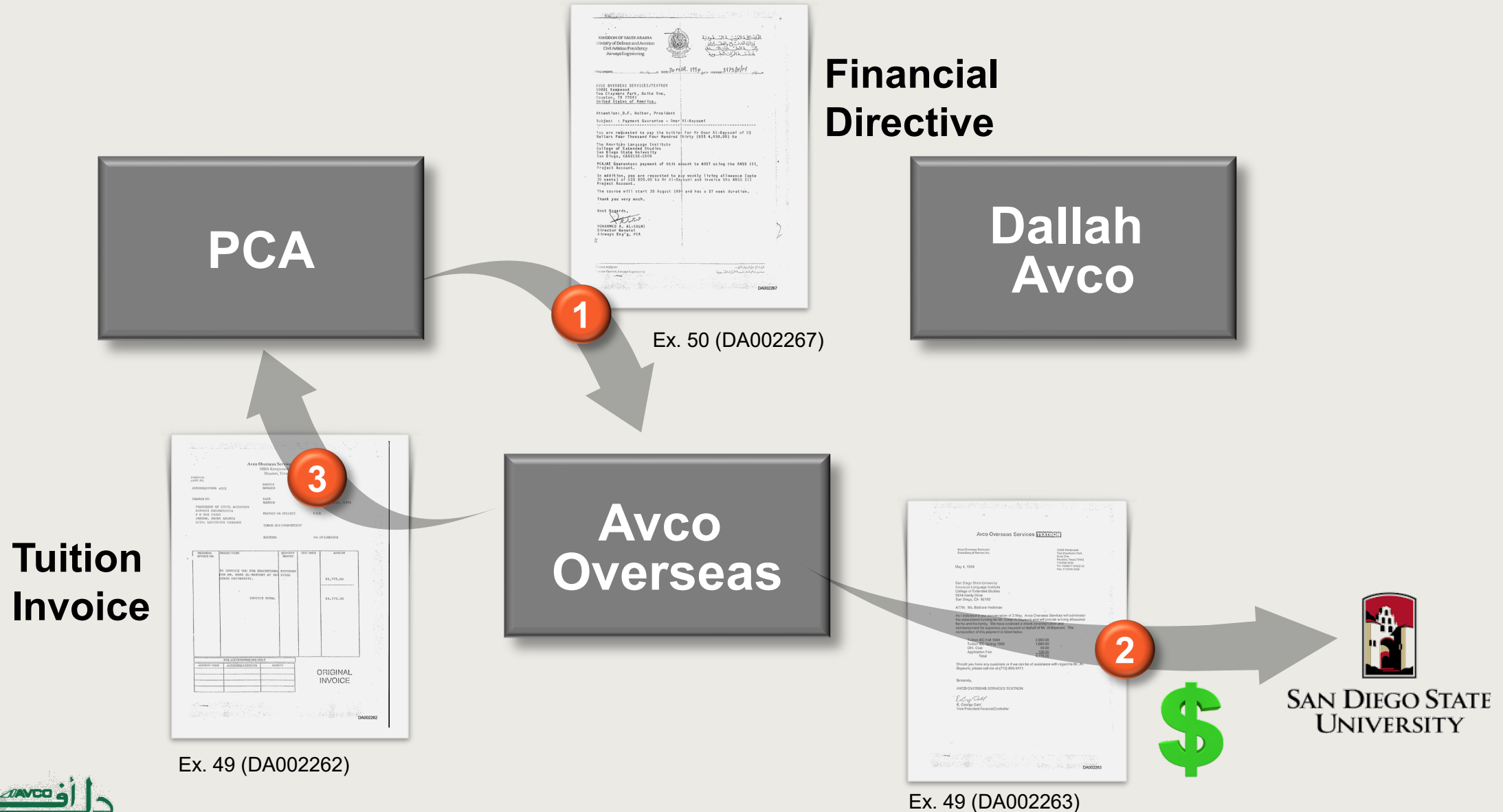
28/19

An employee may be granted educational leave without pay if he/she holds a high school diploma or its equivalent, provided that:

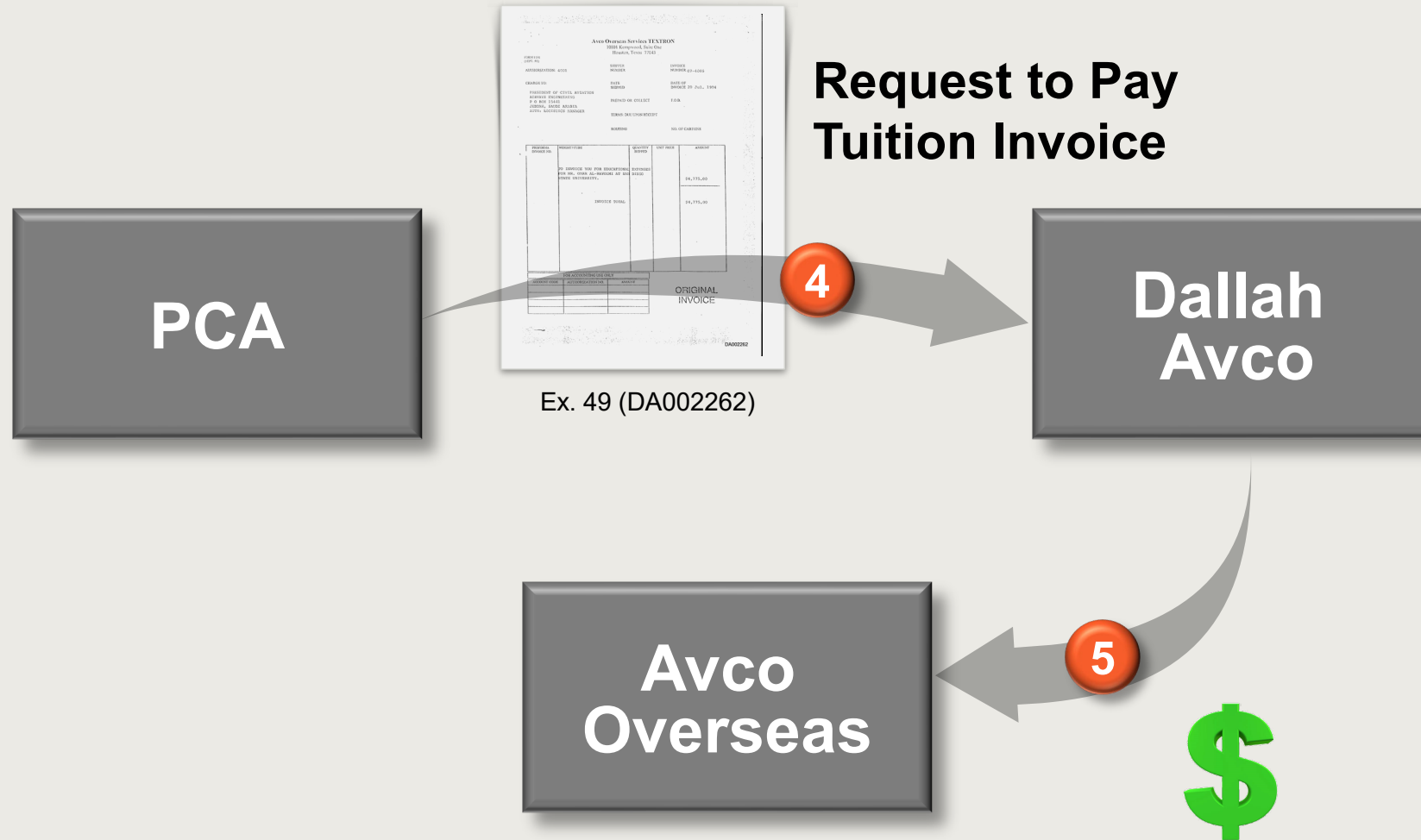
1- He/she has spent three years in service with a job evaluation of at least "Good."

2- His/her major is relevant to the work of the authority wherein he/she works.

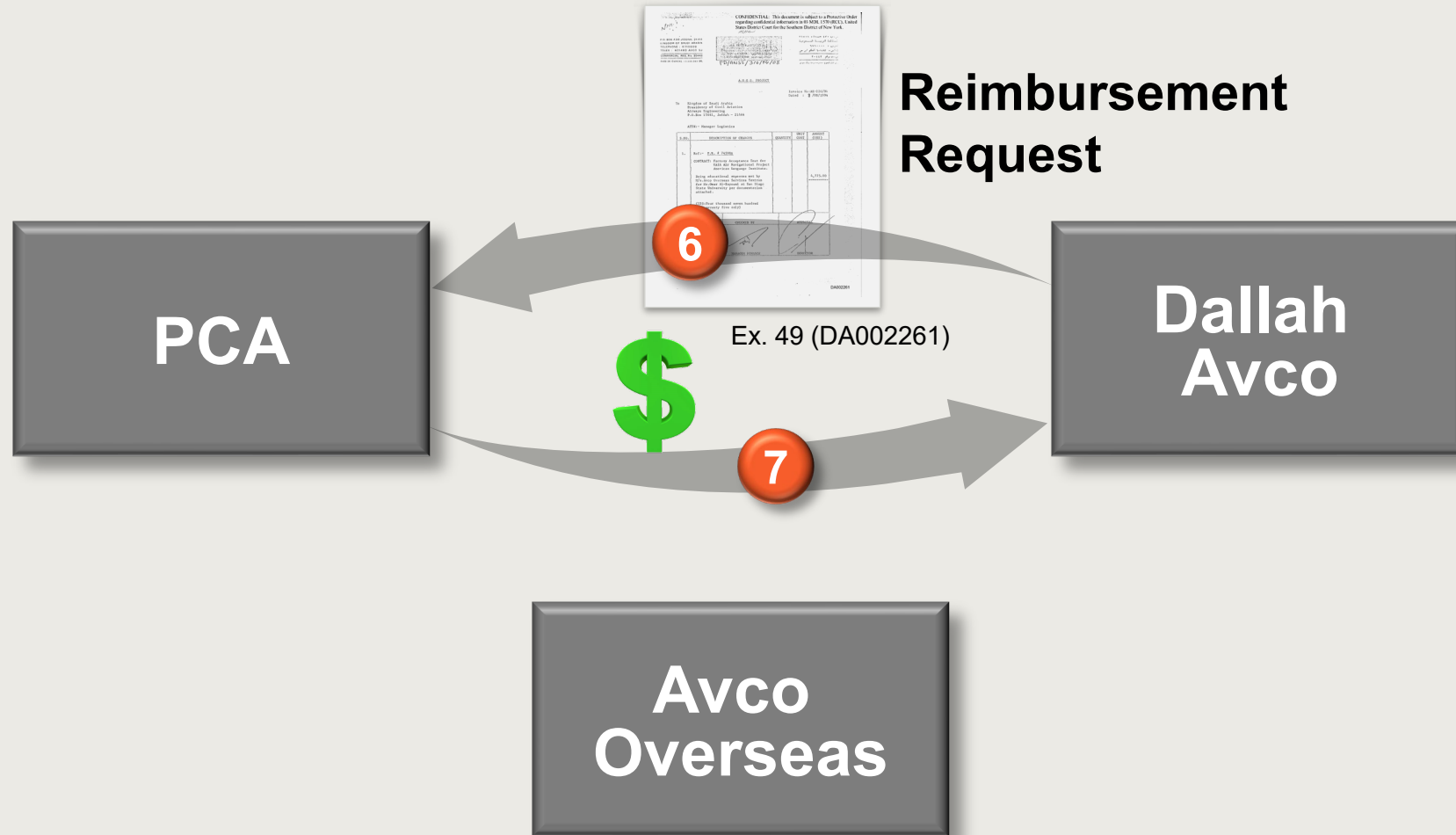
Logistics Payments through Avco Overseas



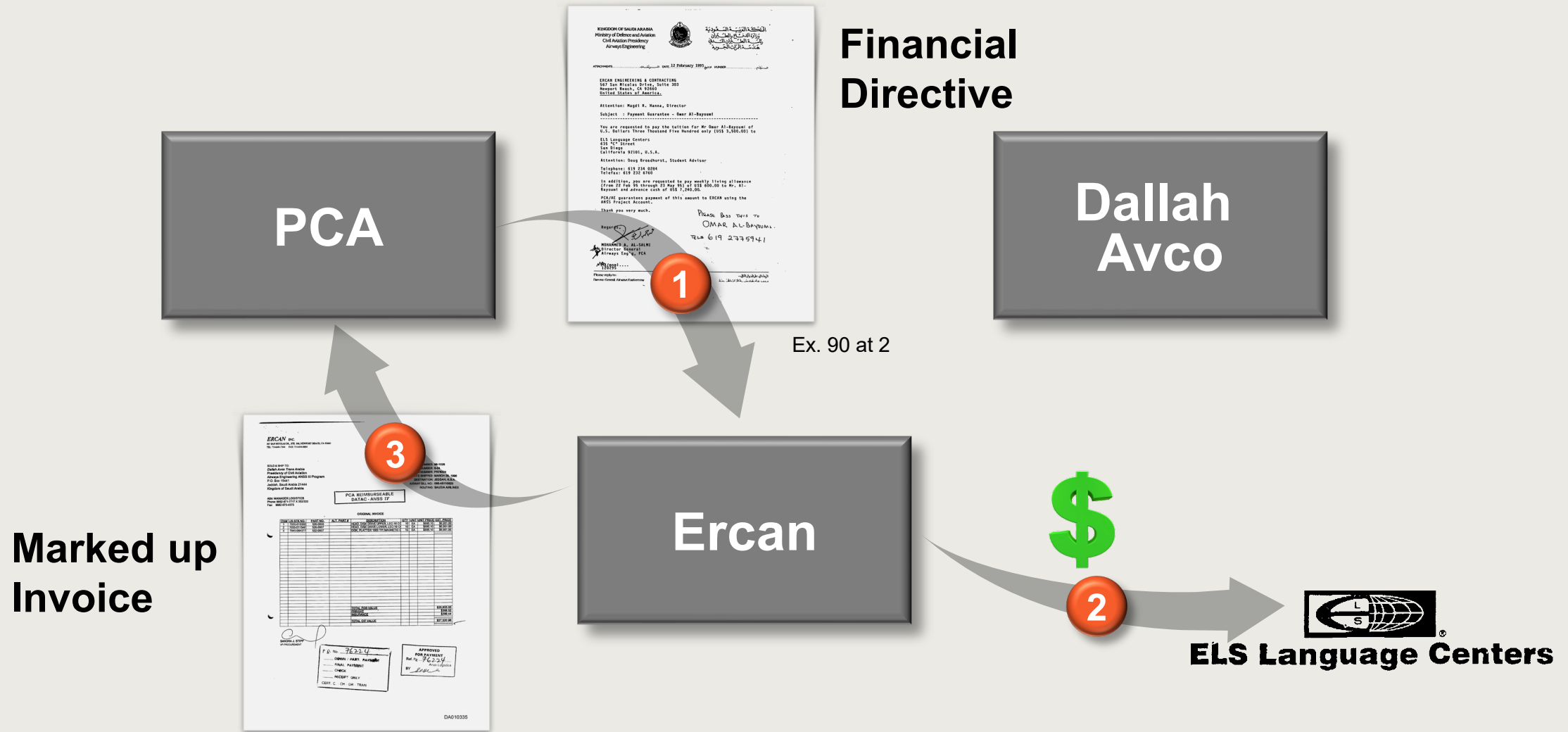
Logistics Payments through Avco Overseas



Logistics Payments through Avco Overseas



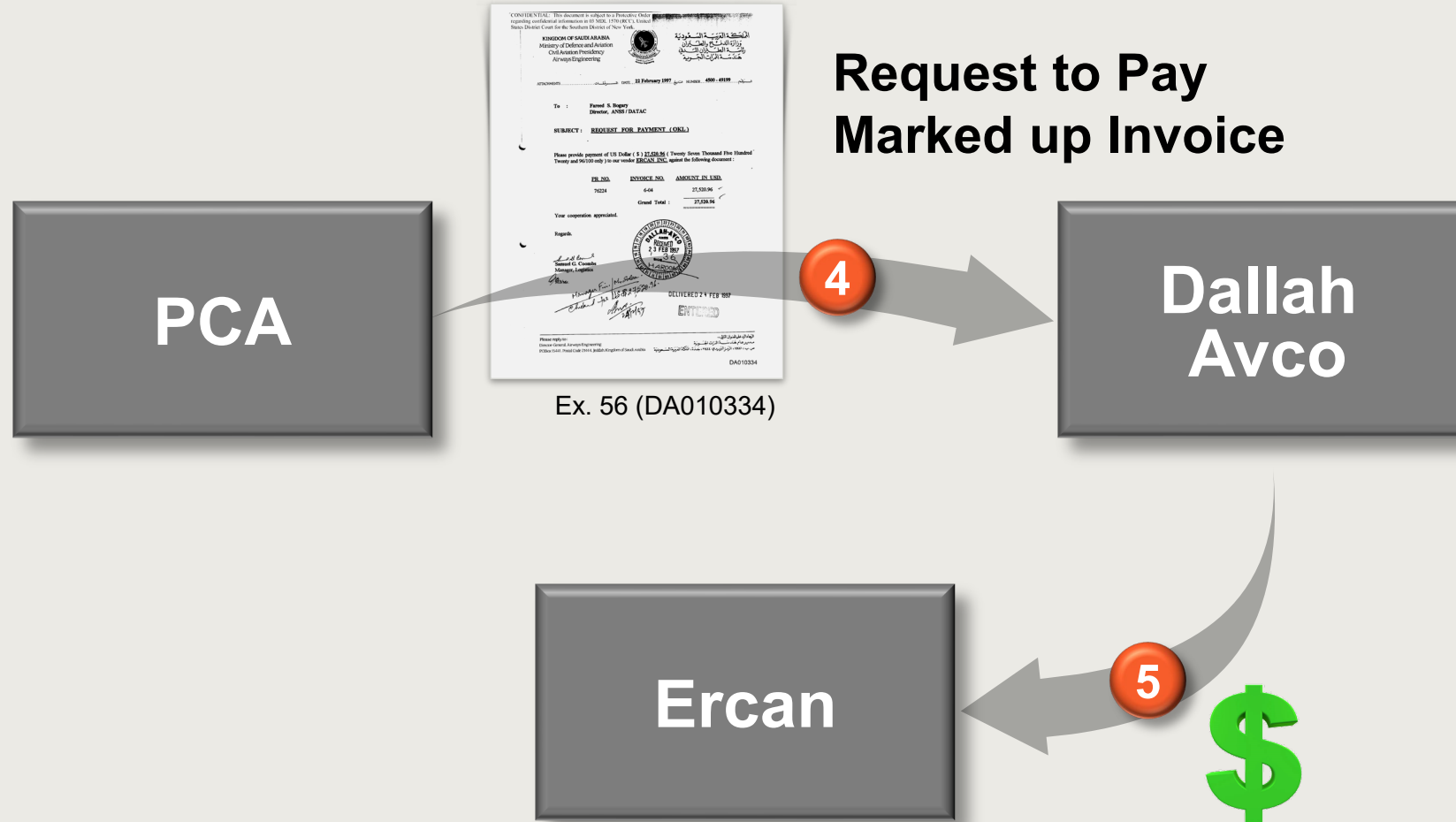
Logistics Payments through Ercan



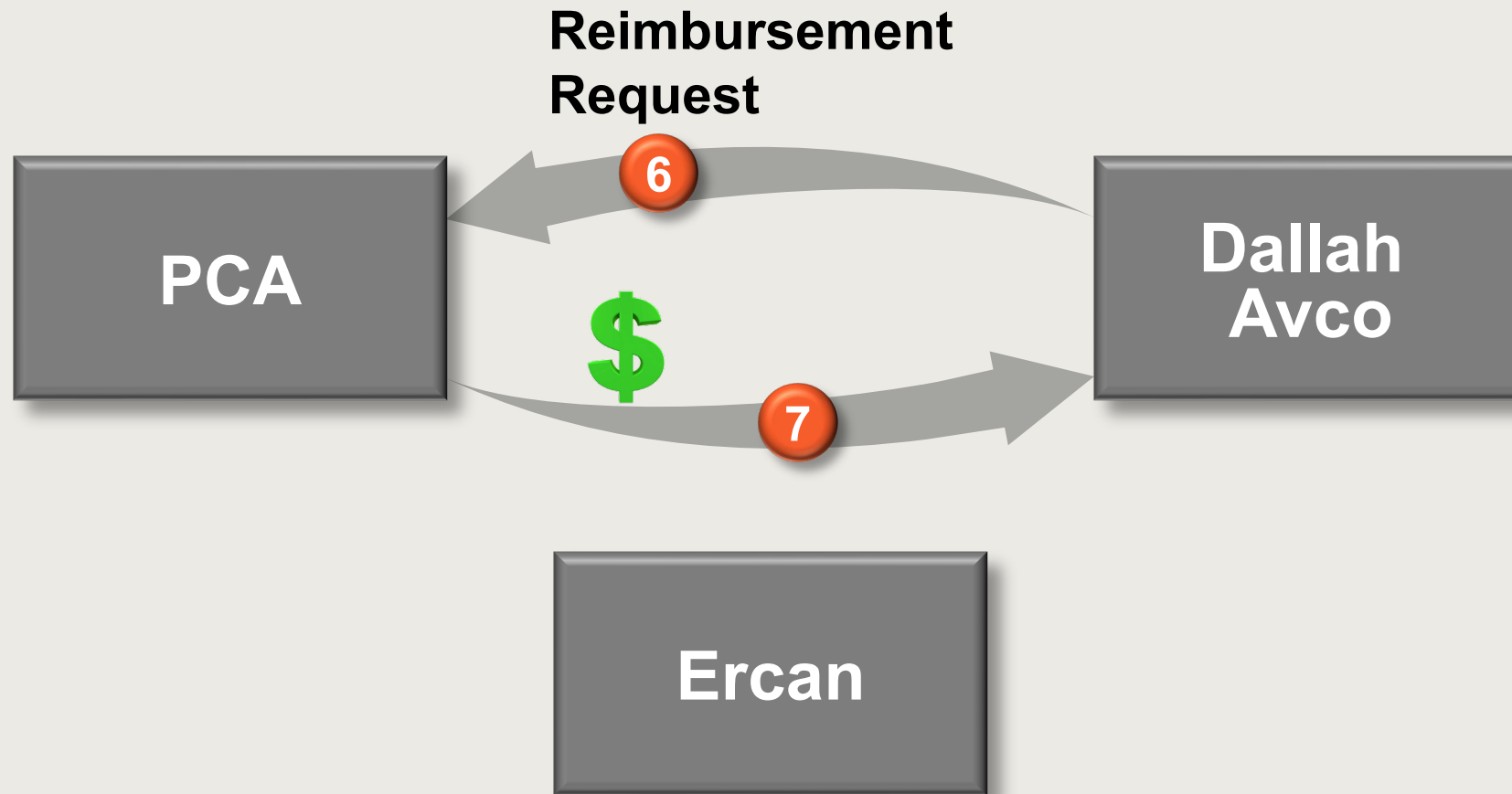
Ex. 90 at 2

Ex. 56 (DA010335)

Logistics Payments through Ercan



Logistics Payments through Ercan



Al Bayoumi's ANSS Employee Payroll

(June 1995 – Mar 2000)

June 1995

Level G: Senior Data Processing Technician

[illegible]

Ex. 27 (DA001016)

Sept 1998

Level G: PCA/AE Budget Coordinator

CONFIDENTIAL: This document is subject to a Protective Order
prohibiting confidential information in OJ 1001, 150 (RUC) - Limited
States Notice of Court for the Southern District of New York.

NOTICE OF EMPLOYMENT

EMPLOYER NUMBER		CITY		HO-SS-SS-SS-SS		DO		MM		YY	
EMPLOYEE NAME		CITY		M. AL. BROWN		FAMILY					
ASSIGNED DATE		0		BIRTHDATE		ANNO DOMINI					
DEPARTMENT		AD		JOB TITLE		DOE TITLE					

NATIONALITY		EDUCATION		DOE OF BIRTH		DOE OF BIRTH	
1. NATIONALITY		1. NATIONALITY		1. NATIONALITY		1. NATIONALITY	
2. NATIONALITY		2. NATIONALITY		2. NATIONALITY		2. NATIONALITY	
3. NATIONALITY		3. NATIONALITY		3. NATIONALITY		3. NATIONALITY	
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58. NATIONALITY		58. NATIONALITY		58. NATIONAL			

Ex. 19 (DA000098)

Al Bayoumi's ANSS Employee Payroll

(April 2000 – May 2002)

April 2000
**Level C: Senior DSS
Programmer**

[illegible]

Ex. 14 (DA000082)

Sept 2001
Level B: Senior
Contracts Specialist

[illegible]

Ex. 24 (DA000602)

Nov 2001
PCA pay cut

[illegible]

Ex. 25 (DA000603)

Al Bayoumi's Salary and Benefits

Pay Advice Report(Run : 05-NOV-1999)

Personal Monthly Salary 7740 Number 050040		Job Title 0070301 Name AL BAYOUMI, Mr. OMER AHMED	
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Payments		Deductions	
Basic Salary	7740.00		
Housing Allow	1290.00		
Other Allowance	1742.00		
Tranporrtation	774.00		
Total	11546.00	Total	

Tax Tax Period 7 Tax Ref. No. DALLAH Tax Tel. No. Tax Code Tax Basis Non Cumul. N.I. Number N.I. Category Pay Date 05-NOV-1999	
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Amount Paid Amount 11546.00	
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Payment Methods			
Method	Bank	Account No.	Amount

Balances	
Gross YTD	11546.00
Gross PTD	11546.00
Taxable YTD	11546.00
Taxable PTD	11546.00
PAYE YTD	0.00
Nlable YTD	0.00

Messages	
Message	

Al Bayoumi's "Other Allowances"

Pay Advice Report(Run : 05-JUL-2000)

Personal Monthly Salary: 9500 Number: 050040 Job Title: 0032101 Name: AL BAYOUMI, Mr. OMER AHMED		Tax Tax Period: 3 Tax Ref. No.: DALLAH Tax Tel. No.: Tax Code: Tax Basis: Non Cumul. N.I. Number: N.I. Category: Pay Date: 05-JUL-2000																		
Payments <table border="1"> <tr> <td>Basic Salary</td> <td>9500.00</td> </tr> <tr> <td>Housing Allow</td> <td>1583.00</td> </tr> <tr> <td>Other Allowance</td> <td>14271.00</td> </tr> <tr> <td>Tranportation</td> <td>950.00</td> </tr> </table>		Basic Salary	9500.00	Housing Allow	1583.00	Other Allowance	14271.00	Tranportation	950.00	Deductions <table border="1"> <tr><td></td><td></td></tr> <tr><td></td><td></td></tr> <tr><td></td><td></td></tr> <tr><td></td><td></td></tr> <tr><td></td><td></td></tr> </table>										
Basic Salary	9500.00																			
Housing Allow	1583.00																			
Other Allowance	14271.00																			
Tranportation	950.00																			
Amount Paid Amount: 26304.00		Balances <table border="1"> <tr><td>Gross YTD</td><td>26304.00</td></tr> <tr><td>Gross PTD</td><td>26304.00</td></tr> <tr><td>Taxable YTD</td><td>26304.00</td></tr> <tr><td>Taxable PTD</td><td>26304.00</td></tr> <tr><td>PAYE YTD</td><td>0.00</td></tr> <tr><td>Nlable YTD</td><td>0.00</td></tr> </table>	Gross YTD	26304.00	Gross PTD	26304.00	Taxable YTD	26304.00	Taxable PTD	26304.00	PAYE YTD	0.00	Nlable YTD	0.00						
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Messages <table border="1"> <tr><td>Message</td></tr> <tr><td></td></tr> <tr><td></td></tr> </table>		Message																		
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Other Allowance 14271.00





What Did Sam Coombs Say?

ANSS Logistics Manager



Sam Coombs

ANSS Logistics Manager

Q. So is it correct that you had no substantial contacts with Dallah Avco, other than your paycheck, while you were working as logistics manager at Airways Engineering?

A. True.

Q. Did anyone from Dallah Avco direct or supervise your day-to-day work at Airways Engineering?

A. No way. No.

* * *

Q. And did Al-Salmi direct and supervise your day-to-day work at Airways Engineering?

A. He directed me -- basically he would call me in and talk to me about what he wanted done, and then he'd just turn me loose. I was kind of independent.

But, yes, if something was outside of the norm, I did go clear it with him.

22 June 2021 Dep. Tr. (82:17-83:1; 84:6-15)



Sam Coombs

ANSS Logistics Manager

Q. How many students were a part of this arrangement where the logistics department budget would be used to pay their -- pay for their studies?

A. It fluctuated between 45 and 50, and some of them are like interns. They would come on board temporarily in Saudi, and then they'd apply for it.

* * *

Q. This was a common practice not only at PCA but at other Saudi businesses, correct?

A. That's correct.

22 June 2021 Dep. Tr. (48:6-13; 50:20-23)



Sam Coombs

ANSS Logistics Manager

- Q. When you say "everybody said he was in school," who are you referring to as "everybody"?
- A. The people talking around the -- inside the -- you know, like when they said, yeah, he's in the States. You know, I'd ask a question, and they'd say, yeah, he's in the States going to school.
- Q. Approximately how many people made comments like that to you?
- A. Four or five. You know, Alp Karli and Hamad Rashid -- Hamad Al-Rashid. There's several of them that would say things like that to me. So I just quit asking.

22 June 2021 Dep. Tr. (128:15-129:3)



Sam Coombs

ANSS Logistics Manager

Q. Mr. Coombs, throughout your time at Airways Engineering, did you understand that Omar Al-Bayoumi was pursuing educational studies in the United States?

A. Yes.

Q. Did you ever tell Dallah Avco that Al-Bayoumi was doing something other than pursuing educational studies in the United States?

A. No.

22 June 2021 Dep. Tr. (150:16-25)



Sam Coombs

ANSS Logistics Manager

Q. So is it fair to say that the reason you considered the expenses unusual was just that they were -- gave Al-Bayoumi a higher standard of living than the other Saudi students that were being funded through logistics?

A. Yes.

* * *

Q. At any time did you ever learn that Al-Bayoumi was using his educational funding to plan terrorist attacks or engage in other criminal activity in the United States?

A. No. No.

Q. At any time did you even suspect that Al-Bayoumi was using his educational funding to plan terrorist attacks or engage in other criminal activity in the United States?

A. No.

22 June 2021 Dep. Tr. (130:15-21; 132:11-22)

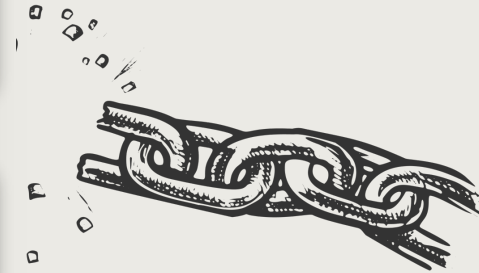
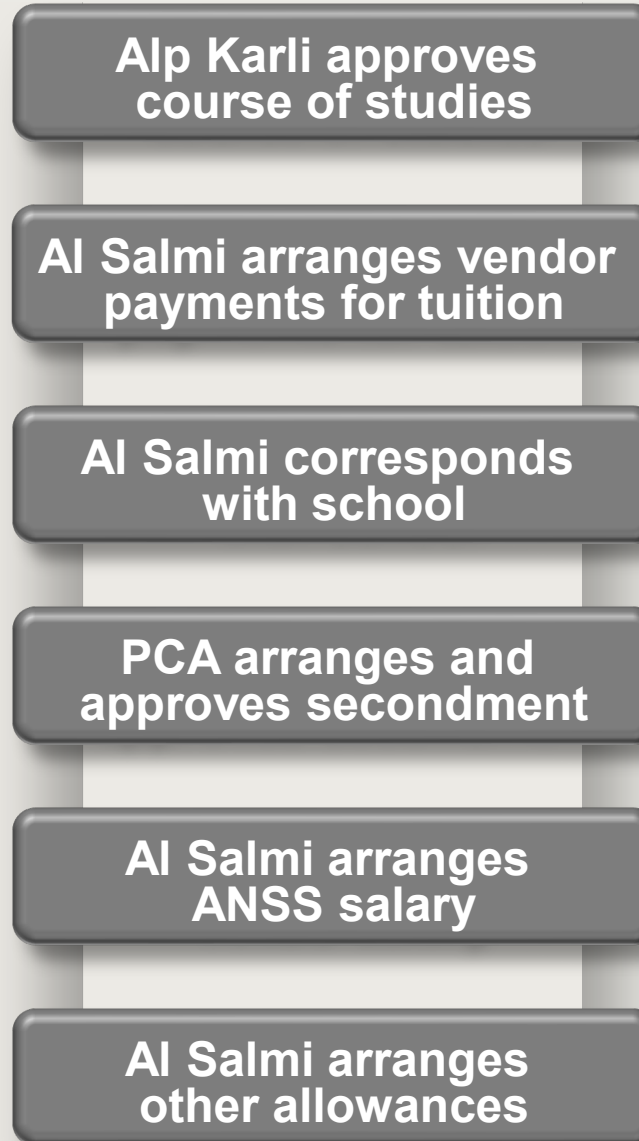


No Proximate Cause

Dallah Avco's Attenuated Relationship to Al Bayoumi



Processed
salaries and
benefits for 1400
ANSS employees



Omar Al Bayoumi

Al Bayoumi's Attenuated Relationship to the 9/11 Attacks

Feb. 1, 2000

Al Bayoumi meets Hazmi & Mihdhar at restaurant

Feb. 4, 2000

Al Bayoumi helps Hazmi & Mihdhar with lease & security deposit

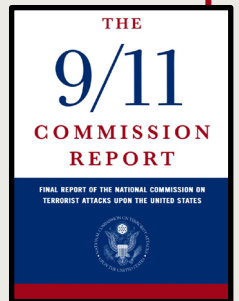
Feb. 17, 2000

Social event at Hazmi & Mihdhar's apartment

May 31, 2000

Hazmi & Mihdhar move out

Sept. 11, 2001
Terrorist Attacks



Al Bayoumi's Single Phone Call to Dallah Avco



Omar Al Bayoumi

January 10, 1999
5:06 AM



